

Patrick G. Byrne (Nevada Bar #7636)
Morgan Petrelli (Nevada Bar #13221)
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: 702.784.5200
Facsimile: 702.784.5252
Email: pbyrne@swlaw.com
mpetrelli@swlaw.com

Walter C. Carlson (*Pro Hac Vice*)
Lawrence P. Fogel (*Pro Hac Vice*)
Caroline A. Wong (*Pro Hac Vice*)
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, IL 60603
Telephone: 312.853.7000
Facsimile: 312.853.7036
Email: wcarlson@sidley.com
lawrence.fogel@sidley.com
caroline.wong@sidley.com

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE DANIELS FAMILY 2001 REVOCABLE
TRUST, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

LAS VEGAS SANDS CORP., DR. MIRIAM
ADELSON, in her capacity as Special
Administrator of the estate of SHELDON
G. ADELSON, PATRICK DUMONT, and
ROBERT G. GOLDSTEIN,

Defendants.

Case No.: 2:20-cv-01958-CDS-EJY

**STIPULATION REGARDING
DEADLINE FOR PARTIES TO
SUBMIT DISCOVERY PLAN AND
SCHEDULING ORDER**

Defendants Las Vegas Sands Corp., Dr. Miriam Adelson, in her capacity as Special Administrator of the Estate of Sheldon G. Adelson, Patrick Dumont, and Robert G. Goldstein (collectively, “Defendants”), and Lead Plaintiffs Carl S. Ciaccio and Donald M. DeSalvo (collectively, “Plaintiffs,” and together with Defendants, “the Parties”) stipulate that the deadline for the Parties to submit a discovery plan and scheduling order by January 12, 2024 has been

1 mooted by the Court's recent orders granting Defendants' Motion for Reconsideration and
 2 dismissing Plaintiffs' Second Amended Complaint. *See* ECF Nos. 146, 147. The Parties further
 3 state as follows:

4 1. On August 8, 2023, the Court issued an Order granting in part and denying in part
 5 Defendants' motion to dismiss Plaintiffs' Second Amended Complaint. ECF No. 108.

6 2. On August 22, 2023, Defendants filed a Motion for Partial Reconsideration, or for
 7 an Order Certifying an Interlocutory Appeal, of the Court's August 8 Order, ECF No. 109 ("Motion
 8 for Reconsideration"), and a Motion for Stay Pending Adjudication of Defendants' Motion for
 9 Reconsideration, ECF No. 110 ("Motion for Stay").

10 3. On September 29, 2023, Plaintiffs filed a Motion for a Rule 16 Pretrial Conference
 11 and Order Directing the Parties to Meet and Confer on Scheduling and Discovery. ECF No. 121
 12 ("Motion on Scheduling and Discovery").

13 4. On October 23, 2023, Magistrate Judge Youchah granted Plaintiffs' Motion on
 14 Scheduling and Discovery in part, and ordered the parties to submit a discovery plan and scheduling
 15 order in accordance with her comments on the record on October 23 (the "Discovery Plan") by
 16 December 18, 2023. ECF Nos. 131 & 132.

17 5. On November 13, 2023, Judge Silva entered a Minute Order setting a hearing on
 18 Defendants' Motion for Reconsideration. ECF No. 134. After being rescheduled due to scheduling
 19 conflicts, the hearing was set for December 19, 2023. ECF Nos. 139, 140.

20 6. In light of the hearing date before Judge Silva, the Parties agreed to extend the
 21 deadline for submitting the Discovery Plan to and until January 12, 2024, and Magistrate Judge
 22 Youchah granted an extension accordingly. ECF No. 142.

23 7. On December 19, 2023, after hearing oral argument from the Parties, Judge Silva
 24 issued a Minute Order granting Defendants' Motion for Reconsideration. ECF No. 146. The Minute
 25 Order also denied Defendants' Motion for Stay (*see id.*), which was mooted by the ruling on
 26 Defendants' Motion for Reconsideration.

27 8. On January 2, 2024, Judge Silva issued an Amended Order Regarding Plaintiffs'
 28 Motion for Reconsideration, Defendants' Motion to Dismiss the Second Amended Complaint, and

the Parties' Leave to File Supplemental Authority. ECF No. 147 (the "Amended Order"). Consistent with the prior Minute Order granting Defendants' Motion for Reconsideration, the Amended Order dismissed the Second Amended Complaint in its entirety. *See id.* at 24.

9. The Parties agree that the Court's Amended Order dismissing the Second Amended Complaint moots the Court's prior order directing the Parties to submit a Discovery Plan, and that the deadline for the Parties to submit a Discovery Plan by January 12, 2024 should be stricken accordingly.

For the foregoing reasons, the Parties respectfully request that the Court enter an order striking the Parties' January 12, 2024 deadline to file a Discovery Plan.

Dated: January 12, 2024

ALDRICH LAW FIRM, LTD.

By: /s/ Shannon L. Hopkins

John P. Aldrich, Esq.
7866 West Sahara Ave.
Las Vegas, NV 89117

Shannon L. Hopkins (*Pro Hac Vice*)
Greg M. Potrepka (*Pro Hac Vice*)
David C. Jaynes (*Pro Hac Vice*)
LEVI & KORSINSKY, LLP
1111 Summer Street, Ste. 403
Stamford, Connecticut 06905

Attorneys for Plaintiffs

SNELL & WILMER, L.L.P.

By: /s/ Patrick G. Byrne

Patrick G. Byrne, Esq.
Morgan Petrelli, Esq.
3883 Howard Hughes Parkway, Ste. 1100
Las Vegas, NV 89169

Walter C. Carlson (*Pro Hac Vice*)
Lawrence P. Fogel (*Pro Hac Vice*)
Caroline A. Wong (*Pro Hac Vice*)
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, Illinois 60603

Attorneys for Defendants

IT IS SO ORDERED; provided, however, if a Third Amended Complaint ("TAC") is filed, the parties must submit a proposed discovery plan and scheduling order no later than seven (7) days after the pleading responding to the TAC is filed.



U.S. MAGISTRATE JUDGE

Dated: January 12, 2024